

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
FOURTH DIVISION
Criminal No.: 22-CR-207 (JRT/ECW)**

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|---------------------------|---|--|
| United States of America, |) | |
| |) | |
| Plaintiff, |) | DEFENDANT’S MOTION TO DISCLOSE AND MAKE INFORMANTS AVAILABLE TO INTERVIEW |
| |) | |
| Justin White, |) | |
| |) | |
| Defendant. |) | |

Defendant, Justin White, by and through his attorney, James M. Ventura, respectfully moves the Court pursuant to *Roviaro v. United States*, 353 U.S. 53 (1957), and *United States v. Kitchen*, 480 F.2d 1222 (8th Cir. 1973), for an Order requiring the Government to disclose the names and addresses of any informants and cooperating individuals who were working with, or were utilized by the Government or law enforcement in the above-entitled action, if such informants and cooperating individuals:

1. Were active participants in the offense charges;
2. Were witnesses to the offense charges; and
3. Disclosure of their identities would be useful to Defendant and result in a fair determination of proceedings.

On behalf of Justin White, the undersigned also requests an opportunity to interview any informants and cooperating individuals disclosed by the Government. In addition, the undersigned requests that the Government be required to disclose prior criminal convictions of such informants and cooperating individuals.

The undersigned's review of the discovery thus far indicates that all evidence obtained is circumstantial. Like *Roviaro*, the circumstances of this case demonstrate that any informant's possible testimony is highly relevant to Mr. White's guilt or innocence, and would clearly be helpful to the defense.

This Motion is based upon the Indictment, the records, and files in the above-entitled action, and any and all matters which may be presented prior to, or at the time of the hearing of said Motion.

Dated: September 23, 2022

Respectfully submitted,

/s/ James M. Ventura

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